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May 21, 2018

VIA ECF, ELECTRONIC MAIL & FACSIMILE

Honorable Anita B. Brody, U.S.D.J.
James A. Byrne United States Courthouse
601 Market Street, Rm 7613
Philadelphia, Pennsylvania 19106

**RE: In Re: National Football league Players' Concussion Injury Litigation
No. 2:12-md-02323-AB**

**Request for 14 day Extension of Time to Respond to Unscheduled Motion
For Sanctions and Other Relief (Docket Entry No. 9974)**

Dear Judge Brody:

Our firm represents various entities and individuals named in Co-Lead Counsel's Motion for an Order Sanctioning the Cambridge Entities and for other relief filed on May 8, 2018. *See* Docket Entry No. 9974. Earlier today, I entered my appearance on behalf of Phillip T. Howard and a limited appearance for the purpose of the pending Motion on behalf of Gail Milon, Cambridge Capital Group, LLC; Cambridge Capital Advisors LLC; Cambridge Capital Partners, LP; Cambridge Capital Group Equity Option Opportunities, LP; Cambridge Capital Holdings; and Cambridge Capital Funding, Inc. (collectively, "Cambridge Entities"). A *pro hac vice* application seeking my admission to this Court has been filed on my behalf. The pending Motion seeks sanctions against Mr. Howard, Ms. Milon and the Cambridge Entities.

I write to respectfully request a 14 day extension of the standard 14 day time period to respond to the Motion, currently set to expire tomorrow, Tuesday, May 22, 2018. I have represented Mr. Howard in various matters over the past several years, but I have only recently been retained by him and the Cambridge Entities in relation to this litigation and the pending Motion. While in Tampa, Florida for almost the entirety of last week on an unrelated matter, I began to familiarize myself with the operative facts and the extensive related course of history raised by the pending Motion. The requested 14 day extension of time will allow our firm to provide the Court with a more comprehensive response to the Motion and to clarify certain central issues. As no hearing date has been set for the Court's determination of the Motion itself and the relief sought thereby, I respectfully submit that neither Mr. Seeger nor any other party will be prejudiced by simply extending the subject response period for 14 days until June 4, 2018. Unfortunately, Co-Lead Counsel has refused to consent to my instant request.

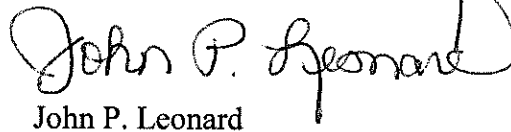
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As I undertake to further investigate and address the serious assertions advanced by the Motion, the Court's kind consideration of the instant request for a 14 day extension to respond would be greatly appreciated.

Respectfully submitted,

MC ELROY, DEUTSCH, MULVANEY & CARPENTER, LLP

A handwritten signature in black ink, reading "John P. Leonard". The signature is written in a cursive style with a large, stylized "L" at the end.

John P. Leonard

cc: Christopher A. Seeger, Esq. (via ECF and electronic mail)
All Counsel of Record (via ECF)